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April 28, 2023

Hon. Colleen McMahon
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Hon. Gabriel W. Gorenstein
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

By Electronic Filing

MEMO ENDORSED

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 5/1/2023

Re: *In re: New York City Policing During Summer 2020 Demonstrations*,
 No. 20 Civ. 8924 (CM) (GWG)

This filing is related to: *Sow et al. v. City Of New York et al.*
 No. 21-cv-00533 (CM)(GWG)

Your Honors:

As counsel for the Plaintiffs and putative class in the *Sow et al. v. City Of New York et al.* case, we write jointly with Defendants to inform the Court that the parties have reached a proposed settlement in principle on all claims, including all claims for the proposed class in the *Sow* case. As the Court is aware, this matter was brought as a putative class action for declaratory relief and monetary damages. The proposed class will consist of people arrested between May 28, 2020 and June 4, 2020 at specific protest locations in New York City.

The parties have agreed to several terms including the amounts for claims awards for putative class members, and to stay further discovery pending submission of a settlement stipulation for the Court's approval. The parties also intend to attempt to separately resolve Plaintiffs' reasonable costs and attorneys' fees. To be clear, these settlement terms, and the agreed- upon stay of discovery, cover only the *Sow* case.

The parties have significant work to do to finalize this class action settlement and are working together in good faith to complete these tasks. This include negotiating the additional terms of the settlement, preparing a full stipulation of settlement, a motion for preliminary approval of the proposed settlement, appointment of a class administrator, and certification of the class pursuant to Fed. R. Civ. P. 23, and proposed class notices and claim forms, among other things. As such, the parties respectfully request until June 30, 2023, to submit the motion along with proposed class settlement documents.

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By Court Order dated February 10, 2023, the Court reset the briefing schedule for motions for class certification. (See Dkt. No. 849). Pursuant to the subsequent court-endorsed Order on April 30, 2023, Plaintiffs must move to certify their class by April 30, 2023. (See Dkt. No. 917). In light of the settlement in principle and the parties' continued negotiations, Plaintiffs hope to be able to seek certification without opposition as a result of the settlement. As such, we respectfully request that the court stay any such motion practice *sine die*, to allow the parties to finalize the settlement of this matter and submit the settlement documents for court approval.

The parties thank for the Court for its consideration of these two requests.

Respectfully submitted,

BELDOCK LEVINE & HOFFMAN LLP



By:

Jonathan C. Moore
David B. Rankin
Luna Droubi
Marc Arena
Deema Azizi
Rebecca Pattiz
Katherine "Q" Adams
Regina Powers

99 Park Avenue, PH/26th Floor
New York, New York 10016
t: 212-490-0400
f: 212-277-5880
e: jmoore@blhny.com
drankin@blhny.com
ldroubi@blhny.com
marena@blhny.com
dazizi@blhny.com
rpattiz@blhny.com
qadams@blhny.com
rpowers@blhny.com

GIDEON ORION OLIVER



277 Broadway, Suite 1501
New York, NY 10007
t: 718-783-3682
f: 646-349-2914
Gideon@GideonLaw.com

COHEN&GREEN P.L.L.C.



By:
Elena L. Cohen
J. Remy Green
Jessica Massimi

1639 Centre Street, Suite 216
Ridgewood (Queens), NY 11385
t: (929) 888-9480
f: (929) 888-9457

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WYLIE STECKLOW PLLC



By: Wylie Stecklow
Wylie Stecklow PLLC
Carnegie Hall Tower
152 W. 57th Street, 8th Floor
NYC NY 10019
t: 212 566 8000
Ecf@wylielaw.com

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